MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT

Permitting and Compliance Division
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Williston Basin Interstate Pipeline Company
Saco Compressor Station
P.O. Box 131
Glendive, MT 59330

The following table summarizes the air quality programs testing, monitoring, and reporting requirements applicable to this facility.

Facility Compliance Requirements	Yes	No	Comments
Source Tests Required	X		Semi-Annual
Ambient Monitoring Required		X	
COMS Required		X	
CEMS Required		X	
Schedule of Compliance Required		X	
Annual Compliance Certification and Semiannual Reporting Required	X		As Applicable
Monthly Reporting Required		X	
Quarterly Reporting Required		X	
Applicable Air Quality Programs			
ARM Subchapter 7 Preconstruction Permitting	X		Permit #2822-02
New Source Performance Standards (NSPS)		X	
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	Except for 40 CFR 61, Subpart M
Maximum Achievable Control Technology (MACT)		X	
Major New Source Review (NSR)		X	
Prevention of Significant Deterioration (PSD)		X	
Risk Management Plan Required (RMP)		X	
Acid Rain Title IV		X	
State Implementation Plan (SIP)		X	General SIP

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SECTION I. GENERAL INFORMATION

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emissions units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the EPA and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in the original application submitted by WBI on June 12, 1996, a significant modification application submitted on March 14, 2003, and the renewal application submitted on February 18, 2003.

B. Facility Location

WBI owns and operates the Saco Compressor Station. This facility is located in the NE¼ of the SW¼ of Section 13, Township 31 North, Range 34 East in Valley County, Montana. Valley County is designated as an Unclassifiable/Attainment area for National Ambient Air Quality Standards (NAAQS) for all criteria pollutants. The Saco Compressor Station is located in rural agricultural setting approximately 4 miles east of Saco, Montana and ½ mile south of U.S. Highway #2.

C. Facility Background Information

Montana Air Quality Permit

The Saco Compressor Station was originally constructed by WBI's predecessor, the Montana-Dakota Utilities Company (MDU), in 1934 and the emission sources consisted of three 200-horsepower (Hp) Ingersoll-Rand Imperial XG compressor engines (Units #1, #2, and #3). Over the period from 1934 to 1959, three 300-Hp Ingersoll-Rand 8XVG compressor engines (Units #4, #5, and #6) and a 660-Hp Ingersoll-Rand 62 KVG compressor engine (Unit #7) were added to accomplish capacity upgrades. In addition to the compressor engines, several auxiliary engines were installed during the period between 1934 and 1947. These auxiliary units consisted of the following equipment: two 45-Hp Waukesha VRG 330 cooling fan drivers; one 38-Hp Waukesha BZ for the gas cooler; one 45-Hp Waukesha VRG 330 for the dehydration system; three 12-Hp Waukesha FC drivers for jacket water pumps; two 12-Hp Waukesha FC engines driving air compressors; and a 10-Hp standby generator (243-Hp total).

On November 20, 1974, MDU filed docket No. CP75-154 with the Federal Energy Regulatory Commission (FERC), which requested authority to construct and operate the additional facility necessary for the transportation of natural gas from the Bowdoin Field, near Saco, Montana to storage at the Cabin Creek, Montana storage area and to farther sales destinations. During the period from 1974 to 1977 Kansas-Nebraska Gas, Inc. (K-N) aggressively developed the production capacity of the Bowdoin area. In November 1977, K-N completed construction of an extensive gas-gathering network in the Bowdoin Field. Coincidental to this event, and for the purpose of handling K-N's additional gas volumes, WBI initiated a pipeline capacity upgrade project, which included construction of the Vida Compressor Station and installation of two Ajax DPC-600 compressor engines at the Saco Compressor Station (Units #8 & #9).

WBI was issued a FERC certificate on May 11, 1977, to construct and operate those facilities identified in docket No. CP75-154. The purchase order for Units #8 and #9 was issued on March 31, 1978, with a no-charge cancellation date of August 15, 1978. The actual on-site construction of Units #8 and #9 at the Saco station began on April 1, 1979, and was completed by April 26, 1979.

In 1981, WBI decommissioned the three 200-Hp Ingersoll-Rand Imperial XG compressor engines (Units #1, 2, & 3) and replaced their horsepower with a 600-Hp Ajax DPC-600 compressor engine (Unit #10). The purchase order for Unit #10 was issued on July 28, 1980, with a no-charge cancellation date of November 1, 1980. The actual installation of Unit #10 was on April 1, 1981, and the project was completed by June 14, 1982. Unit #10 was originally installed with the high air cylinder modification. This engine modification increases the volume of scavenged air during the purge stroke, thus effectively lowering combustion temperatures.

In 1986, WBI replaced the auxiliary drivers at the Saco station (243-Hp total) with electric motors. In conjunction with this switch to electric drivers, a 190-Hp Waukesha 6-NKRU/F1905G standby generator set was installed.

In June 1992, WBI modified Unit #9, a 600 hp Ajax DPC-600 compressor engine, with the high air cylinder modification. This engine modification lowered the NO_x emissions from 15.5 grams per brake horsepower-hour (gram/bhp-hr) to 6.5 gram/bhp-hr and also resulted in a minor increase in fuel efficiency.

In May 1993, WBI had an emission source test conducted to determine the NO_x and CO emissions from the 300-Hp Ingersoll-Rand 8XVG compressor engine (Unit #4) and the modified 600-Hp Ajax DPC-600 compressor engine (Unit #9). The results of the source test for Unit #4, based on averaging the three tests, were 13.29 pounds per hour (lb/hr) or 20.62 gram/hp-hr for NO_x and 2.79 lb/hr or 4.34 gram/hp-hr for CO. The results of the source test for Unit #4 were inconclusive for NO_x because of errors in the testing procedures, but were used to help estimate emissions from Units #4, #5 and #6. The results of the source test for Unit #9, based on averaging the three tests, were 2.91 lb/hr or 2.87 gram/hp-hr for NO_x and 1.05 lb/hr or 1.03 gram/hp-hr for CO.

In addition to the seven compressor engines (Units #4 - #10) and the standby generator, there are eight natural gas-fired boilers/heaters. The boilers/heaters range from 10,000 British thermal units per hour (Btu/hr) to 2.4 million British thermal units per hour (MMBtu/hr) maximum heat input. All of the boilers/heaters were installed at various dates between 1934 and 1987. At the time of the initial permit application review, the Saco compressor station had estimated potential NO_x and CO emissions of 567.3 and 176.90 tons per year (ton/yr), respectively. A Best Available Control Technology (BACT) analysis was conducted as part of the permit review process and, as a result of the Department's BACT determination, the permitted potential emissions would be reduced to 474.60 and 223.06 ton/yr for NO_x and CO, respectively, by the addition of control equipment and enforceable emission limits.

The Department issued a Department Decision (DD) for a prevention of significant deterioration of air quality (PSD) permit for the WBI Saco compressor station on January 19, 1995. The Environmental Protection Agency (EPA) filed an appeal on February 3, 1995, to challenge the BACT determination made by the Department. EPA cited a need for national uniformity in making such determinations for a PSD permit. A stipulated settlement agreement (stipulation) between the Department, EPA, and WBI was agreed to, which eliminated the issues raised by EPA in the appeal.

The stipulation required WBI to make modifications to the Saco compressor station in order to reduce the facility's potential NO_x emissions below 250 ton/yr. WBI was required to install and operate air to fuel ratio (AFR) controllers and/or non-selective catalytic reduction (NSCR) units on any or all of Units #4, 5, 6, and 7 in order to keep the combined potential emissions from Units #4, #5, #6, and #7 below 111.0 ton/yr NO_x and 149.0 ton/yr CO. WBI was also required to install and operate all necessary controls by August 1, 1996. Upon issuance of Permit **#2822-00**, the Saco compressor station was no longer considered a major stationary source, which removed the facility from the PSD permitting requirements. After the installation of the necessary control equipment, NO_x and CO emission limits for Units #4, #5, #6, and #7 were to be established in a permit modification. Permit #2822-00 became final on May 19, 1995.

On February 12, 1996, the Department received a request for a permit modification, with the proposed emission limits for Units #4, #5, #6, and #7. The modification incorporated the emission control requirements and established NO_x and CO emission limits for Units #4, #5, #6, and #7, as required by Section II.A.6 and II.A.7 of Permit #2822-00. In addition, the testing, monitoring, and record keeping requirements were updated. Permit **#2822-01** replaced Permit #2822-00 on September 1, 1996.

On January 23, 2003, the Department received a letter from WBI dated January 20, 2003. WBI requested the Department to amend Montana Air Quality Permit #2822-01 to remove the every-4-year testing requirements from Units #4, #5, #6, #7, #8, #9, and #10 because WBI's Title V Operating Permit #OP2822-00 requires the units to be tested every 6 months.

In addition, on March 14, 2003, the Department received an additional letter from WBI dated March 13, 2003. WBI requested to add a 600-Hp Ajax DPC600LE compressor engine (Unit #11) to the permit according to the provisions of the Administrative Rules of Montana (ARM) 17.8.745.

The administrative amendment removed the every-4-year testing requirements for Units #4, #5, #6, #7, #8, #9, and #10 from the permit and added the 600-Hp Ajax compressor engine to the permit according to the provisions of ARM 17.8.745. Emission limits and testing requirements for the 600-Hp Ajax Compressor Engine were incorporated into the permit according to the provisions of ARM 17.8.745(2). Further, the permit format, language, and rule references were updated to reflect current Department permit format, language, and rule references. Permit **#2822-02** replaced Permit #2822-01 on April 12, 2003.

Title V Operating Permit

On June 12, 1996, WBI submitted the original Title V Operating Permit Application for the Saco Compressor Station. The Title V Operating Permit Application was deemed administratively complete on July 12, 1996, and technically complete on August 12, 1996. Permit **OP2822-00** became final and effective on October 31, 1998.

D. Current Permit Action

On March 13, 2003, the Department received an application (de minimis correspondence) for a significant modification to Permit #OP2822-00. WBI requested the Department to modify the permit to include the 600-Hp Ajax Compressor Engine that was incorporated into the Montana Air Quality Permit according to the provisions of ARM 17.8.745. The application was deemed administratively complete on March 14, 2003, and technically complete on March 20, 2003.

In addition, on February 18, 2003, the Department received a Title V renewal application from WBI. WBI informed the Department that the only change at the facility since Permit OP2822-00 was issued is the addition of the 600-Hp Ajax Compressor Engine, for which WBI had previously submitted a significant modification application. The current permit action incorporates the 600-Hp Ajax Compressor Engine into the permit and renews WBI's Title V Operating Permit for the Saco Compressor Station. Permit **OP2822-01** replaces Permit OP2822-00.

E. Taking and Damaging Analysis

HB 311, the Montana Private Property Assessment Act, requires analysis of every proposed state agency administrative rule, policy, permit condition or permit denial, pertaining to an environmental matter, to determine whether the state action constitutes a taking or damaging of private real property that requires compensation under the Montana or U.S. Constitution. As part of issuing an operating permit, the Department is required to complete a Taking and Damaging Checklist. As required by 2-10-101 through 105, MCA, the Department has conducted a private property taking and damaging assessment and has determined there are no taking or damaging implications. The checklist was completed on September 11, 2003.

F. Compliance Designation

The WBI Saco Compressor Station was last inspected on June 4, 2003. During the inspection, the facility was in compliance with both applicable air quality permits (Montana Air Quality Permit #2822-02 and Title V Operating Permit OP2822-00).

SECTION II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

The Saco Compressor Station serves as a natural gas pipeline booster station to transport gas gathered in the Bowdoin Field near Saco to storage at the Cabin Creek, Montana storage area and to farther sales destinations.

B. Emission Units and Pollution Control Device Identification

Emissions Unit ID	Description	Pollution Control Device/Practice
EU004	300-Hp Ingersoll-Rand 8XVG Reciprocating Engine	AFR Controller
EU005	300-Hp Ingersoll-Rand 8XVG Reciprocating Engine	NSCR Unit and AFR Controller
EU006	300-Hp Ingersoll-Rand 8XVG Reciprocating Engine	NSCR Unit and AFR Controller
EU007	660-Hp Ingersoll-Rand 26KVG Reciprocating Engine	NSCR Unit and AFR Controller
EU008	600-Hp Ajax DPC-600 Reciprocating Engine	Ajax Low Emission Conversion Kit
EU009	600-Hp Ajax DPC-600 Reciprocating Engine	Ajax Low Emission Conversion Kit
EU010	600-Hp Ajax DPC-600 Reciprocating Engine	Ajax Low Emission Conversion Kit
EU011	190-Hp Waukesha 6-NKRU Reciprocating Engine	AFR Controller/when established as main electrical power supply
EU012	600-Hp Ajax DPC600LE Reciprocating Engine	Lean Burn Design

C. Categorically Insignificant Sources/Activities

Emissions Unit ID	Description
IEU01	Fugitive emissions from valves, flanges, open-ended lines, compressor seals, etc.
IEU02	Fugitive emissions from in-plant vehicle traffic
IEU03	Miscellaneous Heaters and Combustion Sources
IEU04	Repair and Maintenance Activities
IEU05	Miscellaneous Tanks

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

The 300-Hp Ingersoll-Rand 8XVG Compressor Engine (EU004) is limited to 16.74 lb/hr for NO_x and 10.50 lb/hr for CO. The NO_x and CO emission limits for the engine were established under ARM 17.8.749. Emissions from the engine are required to be controlled by an AFR controller. In addition, emissions from the engine are limited to 20% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to $E=0.882*H^{-0.1664}$. Further, fuel burned in the engine must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.

Each of the two 300-Hp Ingersoll-Rand 8XVG Compressor Engines (EU005 and EU006) is limited to 2.00 lb/hr for both NO_x and CO. The NO_x and CO emission limits for the engines were established under ARM 17.8.749. Emissions from each of the engines are required to be controlled by a NSCR unit and an AFR controller. In addition, emissions from each engine are limited to 20% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to $E=0.882*H^{-0.1664}$. Further, fuel burned in the engines must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.

The 660-Hp Ingersoll-Rand 26KVG Compressor Engine (EU007) is limited to 4.60 lb/hr for NO_x and 17.50 lb/hr for CO. The NO_x and CO emission limits for the engine were established under ARM 17.8.749. Emissions from the engine are required to be controlled by a NSCR unit and an AFR controller. In addition, emissions from the engine are limited to 20% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to $E=0.882*H^{-0.1664}$. Further, fuel burned in the engine must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.

Each of the three 600-Hp Ajax DPC-600 Compressor Engines (EU008, EU009, and EU010) is limited to 8.60 lb/hr for NO_x, 3.97 lb/hr for CO, and 6.62 lb/hr for VOC. The NO_x, CO, and VOC emission limits for the engines were established under ARM 17.8.752. Emissions from the engines are required to be controlled by an Ajax low emission conversion kit. In addition, emissions from the engines are limited to 20% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to $E=1.026*H^{-0.233}$. Further, fuel burned in the engines must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.

The 190-Hp Waukesha 6-NKRU Generator Engine (EU011) is limited to 5.03 lb/hr for both NO_x and CO, and 0.84 lb/hr for VOC. The NO_x, CO, and VOC emission limits for the engine were established under ARM 17.8.752. Emissions from the engine are required to be controlled by an AFR controller upon establishment of the generator set as the permanent main electrical power supply. Also, WBI is required to operate the engine within an AFR range that minimizes both NO_x and CO emissions. In addition, emissions from the engine are limited to 20% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to $E=1.026*H^{-0.233}$. Further, fuel burned in the engine must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.

The 600-Hp Ajax DPC600LE Compressor Engine (EU012) is limited to 2.65 lb/hr for NO_X, 1.85 lb/hr for CO, and 1.72 lb/hr for VOC. Emissions from the engine are limited to 20% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to $E=1.026*H^{-0.233}$. Further, fuel burned in the engine must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.

B. Monitoring Requirements

ARM 17.8.1212(1) requires that all monitoring and analysis procedures or test methods required under applicable requirements are contained in operating permits. In addition, when the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

The requirements for testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor for all emission units. Furthermore, it does not require extensive testing or monitoring to assure compliance with the applicable requirements for emission units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. When compliance with the underlying applicable requirement for a insignificant emissions unit is not threatened by lack of regular monitoring and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo **(i.e., no monitoring)** will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring for insignificant emission units.

The permit includes periodic monitoring or recordkeeping for each applicable requirement. The information obtained from the monitoring and recordkeeping will be used by WBI to periodically certify compliance with the emission limits and standards. However, the Department may request additional testing to determine compliance with the emission limits and standards.

C. Test Methods and Procedures

Montana Air Quality Permit #2822-02 requires WBI to initially test the 190-Hp Waukesha Generator Engine (EU010) for NO_x and CO, concurrently, to demonstrate compliance with the emission limitations in the permit within 180 days of establishment of the generator set as the permanent main electrical power supply. The permit requires that the tests be performed according to the EPA methods in Appendix A of 40 CFR 60.

Montana Air Quality Permit #2822-02 also requires the 600-Hp Ajax Compressor Engine (EU011) to be tested for NO_X and CO, concurrently, to demonstrate compliance with the emission limitations in the permit, within 180 days of initial start up of the engine or within 180 days of the date Permit #2822-02 becomes final, whichever is later. However, the permit also requires that the engine be initially tested prior to being removed from service because WBI initially intended to operate the engine for approximately three months. The permit requires that the tests be performed according to the EPA methods in Appendix A of 40 CFR 60.

The testing requirements for EU004 through EU009 were removed from the Montana Air Quality Permit, at the request of WBI, because the initial testing requirements had been met and WBI' final and effective Title V Operating Permit requires the emitting units to be tested semi-annually.

Compliance with the opacity, particulate from fuel combustion, sulfur compounds in fuel (gaseous), and VOC limitations in the permit may be demonstrated by burning pipeline quality natural gas (as defined by WBI's FERC gas tariff) on an ongoing basis.

Title V Operating Permit OP2822-01 contains requirement for semi-annual testing with a portable analyzer for all of the emitting units contained in the permit. The semi-annual testing requirements for the 190-Hp Waukesha Generator Engine do not begin until the engine is established as the permanent main electrical power supply. The permit stipulates that the portable analyzer shall be capable of achieving performance specifications equivalent to the traditional test methods in 40 CFR 60, Appendix A or shall be capable of meeting the requirements of EPA Conditional Test Method 022

for the "Determination of Nitric Oxide, Nitrogen Dioxide and NO_x from Stationary Sources by Electrochemical Analyzer." WBI may use another testing procedure as approved in advance by the Department. All compliance source tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). WBI will then convert the NO_x and CO emissions test results from a "ppm" value to a "lb/hr" number. Stack gas flow rates shall be determined using EPA Test Methods in 40 CFR 60, Appendix A in order to monitor compliance with the emissions limitations in the permit.

The Department will use the portable analyzer testing results as a direct measure of compliance. The operating permit may not require testing for all sources if routine monitoring is used to determine compliance, but the Department has the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the WBI may elect to voluntarily conduct compliance testing to confirm its compliance status.

D. Recordkeeping Requirements

WBI is required to keep all records listed in the operating permit as a permanent business record for at least five years following the date of the generation of the record.

E. Reporting Requirements

Reporting requirements are included in the permit for each emissions unit and Section V of the operating permit "General Conditions" explains the reporting requirements. However, WBI is required to submit semi-annual and annual monitoring reports to the Department and to annually certify compliance with the applicable requirements contained in the permit. The reports must include a list of all emission limit and monitoring deviations, the reason for any deviation, and the corrective action taken as a result of any deviation.

F. Public Notice

In accordance with ARM 17.8.132, a public notice was published in the *Glasgow Courier* newspaper on or before October 15, 2003. The Department provided a 30-day public comment period on the draft operating permit from October 15, 2003, to November 14, 2003. ARM 17.8.1232 requires the Department to keep a record of both comments and issues raised during the public participation process. The Department did not receive any comments on the draft operating permit.

Summary of Public Comments

Person/Group Commenting	Comment	Department Response

G. Draft Permit Comments (Permit OP2822-01)

Summary of Permittee Comments

Permit Reference	Permittee Comment	Department Response

Summary of EPA Comments

Permit Reference	EPA Comment	Department Response

SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS

WBI requested a permit shield from all Requirements that were identified as non-applicable in its permit application (OP2822-00). Section IV of Permit OP2822-01 "Non-Applicable Requirements" contains the requirements that the Department determined were non-applicable. The following table summarizes the requirements that WBI identified as non-applicable and contains the reasons that the Department did not include these requirements as non-applicable in the permit.

Applicable Requirement	Reason Not Included in Permit
40 CFR 61, Subpart M, National Emissions Standards for Hazardous Air Pollutants - Asbestos	This is a federal regulation that has specific procedural requirements that may become relevant to the major source during the permit term.

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT/NESHAP Standards

National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (40 CFR Part 63, Subpart HH) and National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities (40 CFR Part 63, Subpart HHH) were promulgated June 17, 1999. As of the issuance date of Permit OP2822-01, Subpart HH and Subpart HHH do not apply to the Saco Central Compressor Station because the facility is not a major source of Hazardous Air Pollutants (HAPs).

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) was proposed by the EPA on December 19, 2002. The estimated promulgation date for Subpart ZZZZ is February 28, 2004. Subpart ZZZZ, as proposed, would not apply to the Saco Compressor Station because the facility is not a major source of HAPs.

National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/ Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) was proposed by the EPA on January 13, 2003. The estimated promulgation date for Subpart DDDDD is February 28, 2004. Subpart DDDDD, as proposed, would not apply to the Saco Compressor Station because the facility is not a major source of HAPs.

B. NSPS Standards

As of the issuance date of Permit OP2822-01, the Department is unaware of any future NSPS Standards that may be promulgated that will affect the Saco Compressor Station.

C. Risk Management Plan

As of the issuance date of Permit OP2822-01, this facility does not exceed the minimum threshold quantities for any regulated substance listed in 40 CFR 68.115 for any facility process. Consequently, this facility is not required to submit a Risk Management Plan.

If a facility has more than a threshold quantity of a regulated substance in a process, the facility must comply with 40 CFR 68 requirements no later than June 21, 1999; three years after the date on which a regulated substance is first listed under 40 CFR 68.130; or the date on which a regulated substance is first present in more than a threshold quantity in a process, whichever is later.